

SO ORDERED VERNON S. BRODERICK  
U.S.D.J. 2/9/2023HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*THE CITY OF NEW YORK  
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February 8, 2023

**VIA ECF**

Hon. Vernon S. Broderick  
 United States District Judge  
 Southern District of New York  
 United States Courthouse  
 40 Foley Square  
 New York, New York 10007

Re: *C.K. obo A.Y., et al. v. NYC Department of Education, et al.*,  
 21-CV-7956 (VSB)(KNF)

Dear Judge Broderick:

I am the Assistant Corporation Counsel assigned to represent Defendants New York City Department of Education, New York City Board of Education, and former Department of Education Chancellor Meisha Porter in the above-referenced action. I write jointly with Plaintiffs' counsel, pursuant to the Court's Order dated December 20, 2022 (Dkt. No. 38), to update the Court on the status of this case.

The parties have reached a settlement in principle resolving the implementation and compensatory education claims of both Plaintiffs C.K. and A.N. The parties have drafted Stipulations of Settlement that memorialize the terms concerning services. Additional time, however, is needed to address Plaintiffs' claim for attorney's fees. Plaintiffs' counsel anticipates providing revised billing records for both Plaintiffs shortly. Upon receipt, the undersigned will need time to review and then obtain settlement authority, after which the parties will engage in negotiations. We expect that the case will be fully resolved sometime thereafter, without the need for the Court's intervention and without the need for discovery, and, at this time, do not believe that a referral to the assigned Magistrate Judge for settlement will be productive.

Accordingly, given the parties' meaningful progress in settlement discussions, the parties respectfully request that the Court grant a 60-day stay of discovery while the parties continue to resolve the remaining fees issue. Further, the parties respectfully propose to provide another joint status letter, or to file proposed Stipulations of Settlement, in approximately 45 days, or by March 27, 2023.

Thank you for your consideration of this request.

Respectfully submitted,

/s/  
Min Kyung Cho  
Assistant Corporation Counsel

cc: Erin O'Connor, Of Counsel  
Counsel for Plaintiffs  
(via ECF)